

1 Rosemary M. Rivas (State Bar No. 209147)

2 Email: rrivas@zlk.com

2 **LEVI & KORSINSKY, LLP**

3 44 Montgomery Street, Suite 650

3 San Francisco, California 94104

4 Telephone: (415) 291-2420

4 Facsimile: (415) 484-1294

5 Eduard Korsinsky (to be admitted *pro hac vice*)

6 Email: ek@zlk.com

6 **LEVI & KORSINSKY, LLP**

7 30 Broad Street, 24th Floor

7 New York, New York 10004

8 Telephone: (212) 363-7500

8 Facsimile: (212) 636-7171

9 *Counsel for Plaintiff Andrew Okusko*

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11 **UNITED STATES DISTRICT COURT**

12 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**

13 **SAN FRANCISCO DIVISION**

14 GGCC, LLC, an Illinois Limited Liability
15 Company, Individually and on Behalf of All Others
15 Similarly Situated,

16 Plaintiffs,

17 v.

18 DYNAMIC LEDGER SOLUTIONS, INC., a
19 Delaware Corporation, TEZOS STIFTUNG, a
20 Swiss Foundation, KATHLEEN BREITMAN, an
21 Individual, and ARTHUR BREITMAN, an
21 Individual,

22 Defendants.

16 Case No. 3:17-cv-06779-RS

17 **CLASS ACTION**

18 **DECLARATION OF ROSEMARY M.
19 RIVAS IN SUPPORT OF
20 ADMINISTRATIVE MOTION TO
21 CONSIDER WHETHER CASES SHOULD
21 BE RELATED**

22 The Honorable Richard Seeborg

23 Action filed: November 26, 2017

24 [Caption continues on next page.]

1 **This document also relates to:**2 ANDREW OKUSKO, individually and on behalf
3 of all others similarly situated,

4 Plaintiff,

5 v.

6 DYNAMIC LEDGER SOLUTIONS, INC., THE
7 TEZOS FOUNDATION, KATHLEEN
BREITMAN, ARTHUR BREITMAN, and
TIMOTHY DRAPER,

8 Defendants.

9
10 Case No. 3:17-cv-06829-SI

11 The Honorable Susan Illston

12 Action filed: November 28, 2017

13 I, Rosemary M. Rivas, declare as follows:

14 1. I am a member in good standing of the Bar of this Court, and a partner in the law firm
15 of Levi & Korsinsky, LLP, counsel for Plaintiff Andrew Okusko in the above-captioned action
16 ("Okusko Action"). This declaration is based on my own personal knowledge and/or the firm's
17 records of the matters stated herein and, if called upon, I could and would competently testify thereto.18 2. I submit this Declaration in Support of Plaintiff's Administrative Motion to Consider
19 Whether Cases Should Be Related.20 3. The *Okusko* Action was filed in this District on November 28, 2017, and has been
21 assigned to the Honorable Susan Illston. *GGCC, LLC v. Dynamic Ledger Solutions, Inc., et al.*
22 ("GGCC Action"), filed in this District on November 26, 2017, is currently pending before this Court.23 4. The *Okusko* Action and the *GGCC* Action are both actions filed against the same
24 defendants for violations of Sections 12(a)(1) and 15(a), 15 U.S.C. §§ 77l(a)(1), 77o(a), of the
25 Securities Act of 1933. Specifically, both actions allege that defendants violated the federal securities
26 laws by offering and selling unregistered securities in connection with the Tezos initial coin offering.
Relating the cases will avoid undue burden and cost to the Court and the parties, and will avoid the
potential for conflicting results.27 5. Defendants have not yet appeared in either Action, as these cases were only recently
28 filed. Accordingly, a stipulation could not be obtained under Civil Local Rule 7-12.

6. Concurrently with the filing of this Administrative Motion, Defendants will be served with copies of this motion and all supporting documents filed with it.

I declare under penalty of perjury of the laws of the United States of America that the foregoing is true and correct. Executed on November 30, 2017, in San Francisco, California.

/s/ Rosemary M. Rivas
Rosemary M. Rivas